

GROUP EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ADMIIN INC. d/b/a PARO INC.,)	
A Delaware Corporation,)	
)	
Plaintiff,)	Case No. 1:23-cv-04430
)	
v.)	Judge Franklin U. Valderrama
)	
LUKE KOHAN an individual,)	
and FIRMKEY SOLUTIONS LLC,)	Magistrate Judge M. David Weisman
)	
)	
Defendants.)	

**DEFENDANT FIRMKEY SOLUTIONS LLC'S RESPONSES TO
PLAINTIFF'S FIRST SET OF INTERROGATORIES TO
DEFENDANT FIRMKEY SOLUTIONS LLC**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, and the Order of the Honorable Franklin Valderrama dated July 27, 2023, FirmKey Solutions LLC (“FirmKey”) provides its responses to Plaintiff’s First Set of Interrogatories.

GENERAL OBJECTIONS

1. FirmKey objects to providing information covered by either the attorney work product or attorney client privileges.
2. FirmKey objects to doing anything not required by the Federal Rules of Civil Procedures.

II. INTERROGATORIES

1. Other than FirmKey’s counsel, identify all persons who participated or assisted in, or who were consulted about, the drafting of answers or objections to any of these interrogatories.

ANSWER: Luke Kohan.

2. Identify all persons, including their addresses, phone numbers (home, work and mobile), e-mail addresses, employers and job titles, who possess knowledge of any fact supporting, contradicting, denying, or otherwise relating to the allegations in the Complaint filed in this action, including the fact(s) of which the person is believed to have knowledge.

ANSWER: FirmKey objects to this interrogatory as being overly broad, unduly burdensome, and not proportional to the needs of the case, in that it calls for "any fact supporting, contradicting, denying or otherwise relating to all allegations in the Complaint." This request is objectionable on its face, as is the request for all of their personal information. Subject to and without waiving its objections, FirmKey states that the following individuals have relevant knowledge: Luke Kohan.

3. Identify each (a) shareholder of FirmKey and their percentage of ownership, (b) member of FirmKey, (c) founder of FirmKey, (d) director of FirmKey, and (e) manager of FirmKey.

ANSWER: FirmKey is a partnership. The following individuals are each are one-third owners: Luke Kohan, Samuel Harrison and Joseph Hamilton.

4. Identify the date on which Kohan began his employment with FirmKey.

ANSWER: April 1, 2023

5. Identify the date on which FirmKey was formed.

ANSWER: February 20, 2023

6. Identify and describe in detail all of Kohan's job titles, job duties, responsibilities and expectations in his role at FirmKey.

ANSWER: FirmKey objects to the term "expectations" as being vague and ambiguous. Subject to and without waiving its objections, FirmKey states that Mr. Kohan is

FirmKey's CEO and that he has the responsibilities of helping to grow the business.

7. Identify each FirmKey employee, by name and job title, for which Kohan had, currently has, or is anticipated to have direct supervisory responsibility.

ANSWER: None.

8. Explain in detail any and all steps FirmKey has taken to ensure that Kohan did/does not possess, transmit, and/or misappropriate confidential information or trade secrets of Paro.

ANSWER: FirmKey objects to this interrogatory in that it assumes facts. Kohan has not misappropriated any confidential information or trade secrets of Paro, as he has sworn under oath, so no steps are necessary.

9. State whether Kohan has transmitted, transferred, shared or disclosed any Paro documents or information to or with FirmKey. If your answer is yes, identify and describe the name (by file name) and type of documents or information, the date(s) on which the document or information was transmitted, transferred, shared or disclosed, and where the document or information now resides.

ANSWER: No.

10. State whether Kohan has transmitted, transferred, shared or disclosed the contents of the Non-Competition Agreement to or with anyone affiliated with FirmKey. If your answer is yes, identify and describe the name(s) of the FirmKey employee or representative to whom Kohan transmitted, transferred, shared or disclosed the contents of the Non-Competition Agreement, the date(s) on which the Non-Competition Agreement was transmitted, transferred, shared or disclosed, the method by which the Non-Competition Agreement was transmitted, transferred, shared or disclosed, and the substance of FirmKey's response after receiving or

learning about the Non-Competition Agreement from Kohan.

ANSWER: Mr. Kohan shared the May 15, 2023 cease-and-desist letter with his partners on May 15, 2023, which contained the Non-Compete Agreement. They discussed it.

11. Identify the location(s) and addresses of each of FirmKey's office(s).

ANSWER: There are no offices.

12. Identify the clients with which FirmKey presently works.

ANSWER: FirmKey objects to this interrogatory as being over broad, unduly burdensome, and not proportional to the needs of the case.

13. Identify the experts with whom FirmKey presently works.

ANSWER: FirmKey objects to this interrogatory as being over broad, unduly burdensome, and not proportional to the needs of the case.

14. Identify each person FirmKey expects to call as a witness at the preliminary injunction hearing or trial of this case, and for each person provide his or her last known address, telephone number, place(s) of employment and job title(s), and the subject of his or her anticipated testimony.

ANSWER: Subject to and without waiving its objections, FirmKey identifies Luke Kohan, who will testify at least regarding FirmKey's business.

Dated: August 24, 2023

By: /s/ *Thomas G. Pasternak*

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CERTIFICATE OF SERVICE

I, Thomas G. Pasternak, an attorney, certify that a copy of the foregoing **Defendant FirmKey Solutions LLC's Responses to Plaintiff's First Set of Interrogatories to Defendant FirmKey Solutions LLC** was served on this 24th day of August, 2023, via email upon:

Chad W. Moeller (cmoeller@nge.com)
Sonya Rosenberg (srosenger@nge.com)
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/s/ Thomas G. Pasternak

Thomas G. Pasternak

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ADMIIN INC. d/b/a PARO INC.,)	
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v.)	Judge Franklin U. Valderrama
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LUKE KOHAN an individual,)	
and FIRMKEY SOLUTIONS LLC,)	Magistrate Judge M. David Weisman
)	
)	
Defendants.)	

**DEFENDANT LUKE KOHAN'S RESPONSES TO
PLAINTIFF'S FIRST SET OF INTERROGATORIES
TO DEFENDANT LUKE KOHAN**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, and the Order of the Honorable Franklin Valderrama dated July 27, 2023, Luke Kohan provides his responses to Plaintiff's First Set of Interrogatories.

II. INTERROGATORIES

1. Identify all persons, including their addresses, phone numbers (home, work and mobile), e-mail addresses, employers, and job titles, who possess knowledge of any fact supporting, contradicting, denying, or otherwise relating to the allegations in the Complaint filed in this action, including the fact(s) of which the person is believed to have knowledge.

ANSWER: Kohan objects to this interrogatory as being overly broad, unduly burdensome, and not proportional to the needs of the case, in that it calls for "any fact supporting, contradictory, denying or otherwise relating to the allegations in the Complaint." This is objectionable on its face, as is the request for personal information. Subject to and without waiving its objection, Kohan states that the following individuals have relevant

knowledge; Luke Kohan.

2. Identify each (a) shareholder of FirmKey and their percentage of ownership, (b) member of FirmKey, (c) founder of FirmKey, (d) director of FirmKey, and (e) manager of FirmKey.

ANSWER: FirmKey is a partnership. The following individuals are each are one-third owners: Luke Kohan, Samuel Harrison and Joseph Hamilton.

3. Identify the date on which you began your employment with FirmKey.

ANSWER: April 1, 2023

4. Identify and describe in detail all of your job titles, job duties, responsibilities and expectations in your role at FirmKey.

ANSWER: Kohan objects to the term "expectations" as vague and ambiguous. Subject to and without waiving his objection, Kohan states as follows: Kohan is the CEO of FirmKey and his responsibility is growing the business.

5. Identify each FirmKey employee, by name and job title, for which you had, currently have, or will have direct supervision over as part of your role at FirmKey.

ANSWER: None.

6. Identify all of your cell, home and office telephone numbers since January 1, 2023, and for each number identified, specify whether it was a cell, home or office number.

ANSWER: Kohan objects to this interrogatory as overly broad, unduly burdensome, and not proportional to the needs of the case.

7. Identify all email addresses that you have used since January 1, 2023.

ANSWER: Kohan objects to this interrogatory as not being proportional to the needs of the case.

8. State whether you have directly or indirectly transmitted, transferred, shared or disclosed any Paro documents or information to or with FirmKey. If your answer is yes, identify and describe the name (by file name) and type of documents or information, the date(s) on which the document or information was transmitted, transferred, shared or disclosed, and where the document or information now resides.

ANSWER: No.

9. Do you currently have in your possession, or did you have in your possession following your resignation from Paro, any thumb drive or other portable device containing Paro's information (including but not limited to Paro's confidential information)? If your answer is yes, identify the manufacturer, model and current whereabouts of each such thumb drive or portable device.

ANSWER: No.

10. Excluding the Non-Competition Agreement, do you currently have in your possession, or did you have in your possession following your resignation from Paro, any of Paro's information (including but not limited to Paro's confidential information), in any format, including in hard copy or electronic format (such as contained in an e-mail message)? If your answer is yes, identify the content of the information, the format in which you have or had possession of the information, and the date on which you permanently disposed of such information, if/as applicable.

ANSWER: No.

11. Identify each person affiliated with FirmKey to whom you showed, transmitted, or otherwise disclosed the contents of the Non-Competition Agreement. For each such transmission or disclosure: identify the job title of each such person, the date on which each such

instance occurred, the method by which you communicated, and the substance of the communication.

ANSWER: Mr. Kohan shared the May 15, 2023 cease and desist letter with his partners on May 15, 2023, which contain the Non-Competition Agreement. Then they discussed it.

12. Identify each person you expect to call as a witness at the preliminary injunction hearing or trial of this case, and for each person provide his or her last known address, telephone number, place(s) of employment and job title(s), and the subject of his or her anticipated testimony.

ANSWER: Luke Kohan.

Dated: August 24, 2023

By: /s/ Thomas G. Pasternak

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CERTIFICATE OF SERVICE

I, Thomas G. Pasternak, an attorney, certify that a copy of the foregoing **Defendant Luke Kohan's Responses to Plaintiff's First Set of Interrogatories to Defendant Luke Kohan** was served on this 24th day of August, 2023, via email upon:

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